

GIANAKIS LAW LLC

Attorney at Law

James P. Gianakis
Attorney ID # JG 3930

315 Madison Avenue, 3rd Floor
New York, New York 10017
Telephone: 646.979.3750
Facsimile: 973.218.2401
Mobile: 908.337.4436

March 30, 2021

VIA E-FILING

Honorable Ronnie Abrams, U.S.D.J.
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: **Linnea Michaels, et al. v. Fellowships at Auschwitz for the Study
of Professional Ethics, et al.; Civil Action No. 1:20-cv-05414-RA**

Dear Judge Abrams:

This firm represents the three Plaintiffs – Linnea Michaels, Mary-Kathryn Zoni and Rev. Susan J. McCone – in the above-referenced matter. Counsel for the eight Defendants and I have had several communications in the past week, carrying through earlier today, during which we have been discussing a stipulation to dismiss the Complaint from federal court pursuant to F.R.C.P. 41(a)(2), the amendment of certain claims and removal of certain individually named Defendants, the filing of a similar action in state court, and the exploration of mediation as a possible avenue toward resolution. Defendants have provided their consent to extend the filing deadline for Plaintiffs' opposition to their pending motion for two weeks, so that we can confirm and facilitate the most appropriate path forward. We respectfully request the Court's approval of that extension to April 13, 2021 and thank you for the Court's continuing courtesies.

Respectfully submitted,

s / James P. Gianakis

James P. Gianakis

cc: David E. Strand, Esq. (via e-filing)